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CHINA NORTH EAST PETROLEUM  
HOLDINGS, LIMITED, WANG HUNG JUN,  
GUIZHI JU, ZHANG YANG

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re China North East Petroleum  
Holdings Limited Securities Litigation**

No. 10-CV-04577 (MGC) (THK)  
ECF Case

**CLASS ACTION**

**THIS DOCUMENT RELATES TO:**  
  
**All Actions**

**NOTICE OF MOTION;  
MOTION TO DISMISS  
CONSOLIDATED CLASS ACTION  
COMPLAINT**

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying declaration of Michael J. Coffino dated March 22, 2011 and the exhibits attached to the declaration, this notice, the accompanying memorandum of law in support of this motion, any subsequent submissions that shall be made in support of this motion, and all prior proceedings, the undersigned, on behalf of Defendants China North East Petroleum Holdings Limited, Wang Hung Jun, Guizhi Ju and Zhang Yang will move

this Court, before the Honorable Miriam G. Cedarbaum, at the United States Courthouse, 500 Pearl Street, New York, New York, at 10:00 a.m. on April 14, 2011, to dismiss the Consolidated Class Action Complaint, in its entirety and with prejudice, pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6) and the Private Securities Litigation Reform Act.

Dated: March 22, 2011

Respectfully submitted,

THE CRONE LAW GROUP

By: /s/ Michael J. Coffino

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